



DISTRICT OF COLUMBIA
PUBLIC SCHOOLS

Office of Data and Accountability

DCPS Process and Requirements to Conduct Research or Obtain Confidential Data

All Information for requesters is included herein.
Complete proposals and all inquiries must be submitted to:

Dr. Hella Bel Hadj Amor
District of Columbia Public Schools
Office of Data and Accountability
1200 First St. NE 12th floor
Washington DC 20002
Tel: 202.719.6618 - Fax: 202.442.5792
Hella.BelHadjAmor@dc.gov

Purpose	3
Introduction	4
Important Practical Considerations.....	5
Important Restrictions	6
Requirements for Conducting Research: Proposal	7
1. Acceptable Types of Research Proposals.....	7
2. Cover Sheet (one page).....	8
3. Narrative Description of Research Proposals	9
4. Additional Requirements for Narrative Description of Research Proposals Involving Primary Data Collection	10
5. Supporting Documents for Research Requests	11
Conditions for Access to Confidential Data.....	12
1. Access to Student Data and Students	12
2. Access to Other Individual Data and Other Individuals	13
3. Policy on Active vs. Passive Consent From Parents and Guardians	13
Approve Phase.....	16
Appendix I: Research Priorities.....	19
Appendix II: Factors Typically Considered in the Approval Process.....	20
Appendix III: Template for Description of Proposed Compensation/Incentive Scheme for Participation in Research	21
Appendix IV: Key Provisions from the DCPS Confidentiality Agreement	22
Appendix V: Information to be Included in Parent Consent Forms	24
Appendix VI: Information to be Included in Consent Forms for Adults Other Than Parents.....	25

Purpose

Setting Standards for Research Requests

The District of Columbia Public Schools (DCPS) Office of Data and Accountability has developed this document to establish the requirements for requesters applying for authorization to conduct research in DCPS and/or to receive data DCPS has deemed confidential, personal, and private (Confidential Data), and ensure compliance federal and District of Columbia laws and regulations .

Confidential Data are:

1. Any student records which contain Personally Identifiable Information, as that term is defined by 34 CFR 99.3 of the Family Educational Rights and Privacy Act;
2. Any employment records which contain individual level data (i.e. information about individual employees); and
3. Aggregate data constructed from student or employment records comprising a group size of fewer than ten individuals.

Introduction

We want to make DCPS the best urban school district in the country.

To this end, we welcome high-quality research in DCPS and with DCPS data and we strive to create the conditions for research that is respectful of instructional time and individual privacy.

- **DCPS believes in the power of research** to improve the body of knowledge related to learning and development. DCPS welcomes partnerships with the research community that appreciably benefit DCPS, its students and/or its staff, to the extent that their findings and results will be shared with DCPS to improve public education.
- **We exclusively approve proposals that meet professional standards** for research design and ethical practices, **and have merit and relevance for the school system.**
- **“Research”** refers to any activity aiming at increasing our body of knowledge, and encompasses all investigation, measurement, and evaluation activities, including design, pilots, data collection and analysis, interpretation of results, and conclusions and recommendations. **Data collection** includes, but is not limited to, interviews, focus groups, surveys, tests, observations, ethnographic studies, case studies, analysis of written documents, records, tables, primary and secondary data, and experimental designs. This document governs requests for data (and research based on data) that:
 - Exist, or must be constructed based on existing data, or do not exist and must be collected.
 - Are disaggregate (including student- and other individual-level data), as well as aggregate data where identification is possible explicitly or implicitly (e.g., school-level data on subgroups where some subgroups have a size of one).
- Please direct all **inquiries** to Dr. Hella Bel Hadj Amor in the Office of Data and Accountability at hella.belhadjamor@dc.gov or (202) 719-6618.
- **For non-confidential data requests**, non-DCPS employees should email a cover sheet as described below to Dr. Bel Hadj Amor. Aggregate data requests are generally filled in two to four weeks depending on the workload of Office of Data and Accountability staff. DCPS employees should submit their requests directly in the Data Request Tool.

Important Practical Considerations

DCPS focuses on student achievement and the top core value of the Office of Data and Accountability is to serve our schools.

For those reasons:

- Interference with school instruction and operations must be kept to a minimum.
- Due to the number of requests that Office of Data and Accountability staff receive, our ability to review and support external research projects, and to provide access to student data and data that require substantial manipulation (e.g., merging different data sources or across multiple years), is limited. DCPS reserves the right to start charging fees at any time for data and research requests not covered by the Freedom of Information Act. Requesters will be notified of the cost before it is incurred.

Important Restrictions

The Office of Data and Accountability is committed to protecting DCPS students and staff, their privacy and that of their data.

- We have a legal and ethical obligation to protect the privacy of our students. The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.
- DCPS will carefully consider the best interests of its students before granting access to them, their data, or our staff and their data. When it does, DCPS will grant access to students, staff, facilities, and/or data that are **directly relevant** to the request as approved by the Office of Data and Accountability.
- **Requesters may not request permission to conduct research directly from schools or departments.** All research and confidential data requests, including individual-level data requests, must be submitted to the Office of Data and Accountability for review and approval.
- Requesters have the right, consistent with scientific standards, to publish, present, or use results from the research or data analysis, but only if the publication, presentation or use does not permit personal identification of DCPS students or their parents by individuals other than representatives of the requester. DCPS may require that schools or the District not be identified. In order to protect the confidentiality of previously identified confidential information disclosed to the requester, the requester must provide to DCPS any proposed publications or presentations which are to make public any findings, data, or results of the research or data analysis for DCPS's review and comment at least fourteen (14) days prior to submission of a manuscript or abstract for publication or the date of the presentation. In some instances, and at its sole discretion, DCPS may also require the right to approve proposed publications or presentations, as well as co-authorship with DCPS staff.

Requirements for Conducting Research: Proposal

1. Acceptable Types of Research Proposals

Below are the types of research proposals that we accept for review.

- Proposals for research activities originating within DCPS offices, departments, divisions, and other units, transmitted through their central office administrative channels.
- Proposals for studies for master's theses and doctoral dissertations originating from DCPS employees – proposals from other college students may be considered with support from a DCPS employee.
- Responses to DCPS requests for proposals for external audits and research.
- Unsolicited research proposals from individuals or organizations independent of DCPS. Organizations must have, and individuals must be affiliated with an organization that has, an Institutional Review Board (IRB).

Further, proposed research should support DCPS goals as outlined in DCPS' Five-Year Action Plan. These research priorities are listed in Appendix 1. Factors typically considered in the approval process are listed in Appendix 2.

2. Cover Sheet (one page)

Date:

Title:

Requester/Organization Name:

Note: Replace ☐ with ☒ where relevant.

Issue	Comments
Description. <input type="checkbox"/> Program <input type="checkbox"/> Research	<ul style="list-style-type: none"> ▪ DCPS contact if any. ▪ Comment. ▪ Comment. ▪ Comment.
Timeline. <input type="checkbox"/> 2009-10 <input type="checkbox"/> 2010-11 <input type="checkbox"/> 2011-12 <input type="checkbox"/> 2012-13 <input type="checkbox"/> 2013-14	<ul style="list-style-type: none"> ▪ Specify activity/activities in each year. ▪ Comment. ▪ Comment. ▪ Comment.
Data Collection From/in Schools.	<ul style="list-style-type: none"> ▪ Include school type. ▪ Comment. ▪ Comment. ▪ Comment.
Data Requested from ODA/DCPS.	<ul style="list-style-type: none"> ▪ Comment. ▪ Comment. ▪ Comment.
DCPS Advocate(s) if any.	<ul style="list-style-type: none"> ▪ Comment. ▪ Comment. ▪ Comment.

3. Narrative Description of Research Proposals

All requests must be submitted in writing. The following requirements are typically included. Any particular proposal might not include all items, and DCPS reserves the right to require additional materials. Complete information enables the most informed review and minimizes time spent requesting and reviewing additional materials. The proposal must be presented with such coherence and contain whatever elements are essential to describe a scholarly investigation of an educational matter. Reviewers will consider the written presentation of the proposal as a sample of the quality to be expected in the final report of the study. **Proposal narratives may not exceed 15 pages in length, in 11-pt Calibri font, single-spaced, with 1" margins.**

- Title of the study.
- Name and title of senior requesters.
- Executive summary or abstract (no more than 200 words).
- Statement of the educational problem and its theoretical base.
- Objectives of the study, research questions, hypotheses.
- Significance of the problem, study, and findings to DCPS' operations or the educational services provided to DCPS students, including DCPS research priority under which the project falls (see Appendix 1).
- Brief (2-3 pages) review of literature and/or previous research.
- Research design.
- Setting.
- Sample and selection.
- Data and variables requested and/or to be collected.
- If applicable, case for exception to The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) under which release of data or permission to collect data without consent is requested (see Requirements for Disclosure of Student Data and Access to Students, below). Please include the specific exception under which you are applying and make a clear case for it (e.g., how and why this work will ultimately improve instruction).
- If not, information and consent process and protection of data and privacy:
 - Description of how parents will be informed of the research project, and how parental written permission will be sought for students' participation and release of student data.
 - Plan for the protection and maintenance of the privacy of students and participants in the research, as well as the protection of data.
- Methodology.

4. Additional Requirements for Narrative Description of Research Proposals Involving Primary Data Collection

- Data collection plan and schedule. Include a description of school/student/staff/other involvement and the time commitment requested from them for data collection, treatment, or instructional procedures. Specify how and where data are to be collected, by and from whom, who is to be recruited to participate, and how recruitment will take place. Note that:
 - No DCPS staff time or resources (e.g., DCPS email or mail run) may be used to recruit participants for the research study, and school staff may not be utilized to collect data.
 - The DCPS Central Office does not grant permission for the use of DCPS school buildings for data collection. This arrangement must be made with the school principal when and if the proposal is approved. Participation is at the discretion of principals.
 - All non-DCPS personnel participating in primary data collection must submit to any **background checks** requested by DCPS, including a criminal background check as required by the Criminal Background Checks for the Protection of Children Act of 2004 (D.C. Code § 4-1501.01, et seq. (2009)) and any rules promulgated thereunder.
- Description of how principals and teachers will be informed of the research project, their role in it, and how their willingness to host/participate in the study will be sought. Data collection from staff may be posted on the DCPS website. To this end, please include a paragraph as follows:

Evaluation/study of XXX. Name of organization/researcher/title. Topic/purpose. Instrument (survey, interview etc.). Duration. Frequency. Start and end dates. # teachers and/or schools. Sample/requirements (e.g., random drawing; open to teachers from schools A, B and C etc.). Contact info.
- If applicable, description of any compensation requester proposes to provide for participation in research using the template in Appendix 3. Incentive schemes will be submitted for review by the DCPS Office of the General Counsel, the DC Office of the Attorney General, the Office of Partnerships and Grant Services, and the relevant Union(s). Please note that **outside organizations may not compensate DCPS staff directly in any way**. The compensation process will be explained to individual requesters upon approval of the incentives scheme. Please request the document Data Collection From Staff_Policy for Researchers.doc for more information.
- If applicable, plan to provide parents/guardians access to surveys or materials that will be used with their children in school, including timeline. DCPS staff or resources may not be used prior to the time that these are distributed or administered.

5. Supporting Documents for Research Requests

- Cover sheet.
- Evidence of IRB approval and any IRB-approved forms, including consent forms.
- Copy of any letter to be sent to principals, teachers, parents, or others. Letters to parents must come from the *principal* or other *district manager*, not the requester, and the requester must write the letters accordingly.
- If the *research* project is related to a new *program*, evidence of approval of the *program* from the appropriate central office administrator. If the research project is related to an *existing* program, evidence of approval of the *research* component from the appropriate central office administrator. The Office of Data and Accountability has discretion as to which department(s)/administrators should provide a letter of support. The letter of support must include the name of the requester, a statement of support, and an indication of understanding of what participation in the research study would entail, particularly of student and staff time. If the requester is unclear which department or office should provide a letter of support, please contact the Office of Data and Accountability.
- If applicable, near-final copy of all instruments (e.g., interview and observation protocols, surveys, assessments). For online materials, include a list of all items and relevant information in addition to the link.
- If applicable, evidence of sponsorship by a DCPS staff member i.e., letter of support that includes the name of the requester and organization, a statement of support and an indication of understanding of what participation in the research study would entail, particularly of student and staff time.
- One-page biographical sketches of all key personnel.
- Letter of support from requester's organization (e.g., supervisor, dean, faculty advisor). Organizations other than universities and research institutions are encouraged to submit a letter of support from a professional requester (e.g., university professor). All letters must include contact information.

Conditions for Access to Confidential Data

1. Access to Student Data and Students

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. FERPA exceptions allow schools to disclose information from a student's education record, without consent, only to selected parties, for selected research topics and under certain conditions (34 CFR § 99.31). It is the responsibility of the requester to identify and justify the relevant FERPA exception. The requester and their staff will also have to sign the DCPS Confidentiality Agreement, along with the DCPS Memorandum of Agreement (MOA). For more detail on the provisions included in the Confidentiality Agreement, see Appendix 4. In particular, the requester will affirm that:

- They will comply with all laws pertaining to student confidentiality.
- Student information will be used only for the specific purpose of the agreement.
- The student information will be destroyed when the purpose of the security agreement is completed.
- The student information will not be released to any other party.
- They will notify DCPS immediately in the case of any breach of data security.

If the proposed research or data request do not fit a FERPA exception, the requester must obtain the written informed consent of participants or of a parent on behalf of a student prior to conducting research activities or collecting personally-identifiable information from or on students. Students under 18 years old cannot participate in research without the informed consent of a parent or legal guardian. For students who are 18 or over, the requester must receive written informed consent from the student. Requirements for consent forms are as follows, regardless of the requester's organization's IRB requirements,;

- All consent forms must comply with federal and District of Columbia laws and regulations regarding confidentiality of student records and the protection of study participants, and be approved by the requester's organization's IRB.
- Parent consent forms must be written in easily understood language. The information to be included is listed in Appendix 6.
- All forms must be made available in all relevant languages. Translations and their cost are the responsibility of the requester.
- The requester must keep copies of all consent forms, and make them available to parents and DCPS staff upon request.
- The invitation to participate in research is to be printed on the requester's stationery. Consent forms may not indicate DCPS support or approval of the study.

2. Access to Other Individual Data and Other Individuals

Prior to conducting research activities or collecting personally-identifiable information from staff, the requester must obtain the written informed consent of participants. Requirements for consent forms are as follows, regardless of the requester's organization's IRB requirements,:

- Informed staff consent forms must be approved and stamped by the requester's organization's IRB.
- Consent forms must be written in easily understood language and should provide the information listed in Appendix 6.
- All forms must be made available in all relevant languages. Translations and their cost are the responsibility of the requester.
- The requester must keep copies of all consent forms, and make them available to DCPS staff upon request.
- The invitation to participate in research is to be printed on the requester's stationery. Consent forms may not indicate DCPS support or approval of the study.

3. Policy on Active vs. Passive Consent From Parents and Guardians

This section establishes the conditions under which the **active, written consent of parents and guardians** is required for any survey, analysis, or evaluation involving individual students under the age of 18. DCPS has adopted parental consent requirements derived from the Federal Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98). PPRA requires adherence to these standards *when a survey, analysis, or evaluation is funded by the U.S. Department of Education*. DCPS is adopting these requirements for all research conducted with students irrespective of the funding source in order to establish consistent and appropriate guidelines.

- DCPS requires that schools and contractors make materials available for inspection by parents if those materials will be provided to students in connection with a survey, analysis, or evaluation in which their children participate. In addition, schools and contractors must obtain active informed, written parental consent before minor students participate in any survey, analysis, or evaluation that asks students for information concerning the following topics:
 - Sex behavior and attitudes.
 - Mental and psychological problems potentially embarrassing to the student and his/her family.
 - Critical appraisals of other individuals with whom respondents have close family relationships.
 - Political affiliation.

- Illegal, anti-social, self-incriminating, or demeaning behavior (e.g., violence, drug use).
- Communications with persons in legally recognized privileged or analogous relationships, such as with lawyers, physicians, or ministers.

Parents must be informed of the topics of the survey, analysis, or evaluation before being asked to consent to their children's participation.

- Further, requesters are required to minimize potential mental harm to participants by making the following provisions:
 - Providing a prompt opportunity for participants to obtain appropriate information about the nature, results, and conclusions of the research.
 - Taking reasonable steps to correct any misconceptions that participants may have of which the requesters are aware.
 - When becoming aware that research procedures have harmed or could harm a participant, taking reasonable steps to minimize the harm.
- Parents or students who believe their rights under PPRA in connection with research funded by the U.S. Department of Education may have been violated may file a complaint with the Department by writing the Family Policy Compliance Office. Complaints must contain specific allegations of fact giving reasonable cause to believe that a violation of PPRA occurred.

For more on PPRA see: <http://www.ed.gov/policy/gen/guid/fpco/ppra/index.html>

Requesters may ask for a special review of their proposal to be considered for a **waiver of the active consent policy** articulated above if the data collected are required for federally-mandated reporting AND there is currently no other system in place to collect the federally-mandated data.

If active consent is waived, requesters must implement the following to demonstrate due diligence in ensuring the respect of the rights of students and parents:

- Put in place a thorough procedure to ensure that requesters can address the concerns which drive the active consent policy including:
 - Take steps to ensure INFORMED consent by parents, including but not limited to: following-up with them individually; ensuring that they are aware of both the project **and** the sensitive topics involved; ensuring that parents know that they have the opportunity to opt out and how; identifying parents who opt out. Requesters must document these measures and file this documentation as well as all forms collected from parents so they can be shown to DCPS upon request.
 - Translate all forms into the languages in which DCPS provides translations of vital documents and interpretation services to parents in accordance with the DC Language Access Act of 2004 (since 1997 these languages have been Spanish, Chinese, Vietnamese, French and Amharic) and other languages as needed.

- Clearly describe efforts and activities to mitigate risks, including debriefing sessions in which trained facilitators will answer student questions and provide appropriate resources.
- Document the special circumstances surrounding the project:
 - Clearly articulate the nature and purpose of the project and its requirement to meet federally-mandated reporting (this/those report(s) should be cited).
 - Provide a clear articulation of who will have direct access to confidential data, including individual-level data, and how the data will be stored and protected; include a clear statement that raw (individual-level) data will not be re-disclosed or repurposed, regardless of whether student identifiers are included.
- Submit requests for waivers early enough that, if the waiver is denied, requesters have ample time to implement the active consent process, especially time to collect written consent forms.

Submit requests for waivers as described here for each year of multi-year projects. Each year, requesters must document that the data collected are required for federally-mandated reporting AND there is still no other system in place to collect the federally-mandated data. Every change to the data collection instruments must be highlighted.

Approve Phase

- Decisions to provide confidential data and grant permission to conduct research will be emailed to the applicant. Data may not be obtained and research activities may not begin without first following the procedures outlined in this policy and securing the necessary approvals. Incomplete proposals will not be reviewed.
- The Chief of the Office of Data and Accountability or his/her designee shall approve or deny requests to receive confidential data or conduct research. The signature of the Chief Academic Officer may be required as well, depending on the nature of the research. Proposals involving sensitive issues or substantial commitment of DCPS resources may be referred to the Chief of Staff and Chancellor for approval. Proposals involving access to staff or staff data may be referred to the Labor Management and Employee Relations Office.
- If a research proposal or request for confidential data is approved, the Office of Data and Accountability will issue an approval letter to the requester, as well as a Memorandum of Agreement (MOA) and, if the research involves confidential data, a Confidentiality Agreement, for the requester to sign. The requester must provide a copy of the approval letter to principals to whose schools the requester seeks access. Research may only occur when the school principal(s) and research subject(s) have agreed. A principal may choose to restrict requester's access to the school, students and staff to minimize disruption to school activities.
- The Office of Data and Accountability will provide the requester with information on its secure FTP site which **must** be used to transmit confidential data.
- The Office of Data and Accountability may place additional conditions on requesters as deemed necessary including but not limited to requirements related to insurance and criminal background checks.
- Approval of a research project or confidential data request may be withdrawn for any reason at any time.

- Below is the schedule of upcoming reviews of requests for confidential data and research requests, including new proposals, resubmissions, and continuing projects. Note that there are no reviews in September and January.

June 1, 2010
July 6, 2010
August 3, 2010
October 5, 2010
November 2, 2010
December 7, 2010
February 1, 2011
March 1, 2011
April 5, 2011
May 3, 2011

- Reviews may be re-scheduled for a later day in the same week if the schedule of the reviewers requires it.
- Proposals are reviewed in the order in which they are received.
- Initial review will take place on the scheduled date directly following receipt of a complete proposal or on the following scheduled date depending on proposal receipt date and on the number of proposals already scheduled for review. Proposals must be received at least five business days before the day of a review to be considered for inclusion on that day.
- Following the initial review, DCPS will notify requesters of approval or denial, or request additional information, by email. In the latter case, a follow-up review will take place on the scheduled date directly following receipt of complete additional information or on the following scheduled date depending on additional information receipt date and on the number of proposals already scheduled for follow-up review.
- DCPS cannot guarantee a faster review under any circumstances, although we will make every effort to process requests swiftly. We strongly encourage submission of research requests at least 90 days in advance of proposed research commencement.
- Research proposals and requests for confidential data, including individual-level data, must be submitted electronically to Dr. Hella Bel Hadj Amor in the Office of Data and Accountability at hella.belhadjamor@dc.gov.

Appendix I: Research Priorities

- Compelling Schools – Create schools that provide a consistent foundation in academics, strong support for social and emotional needs, and a variety of challenging themes and programs. E.g., research on academic and other programs and services for all students, including those with special needs, and their families, as well as research on school accountability, safety, and capital improvements.
- Great People – Develop and retain the most highly effective educators in the country, and reward their work. E.g., research on staff performance, including identification, hiring, development, recognition, reward, and accountability of highly-effective employees.
- Aligned Curriculum – Implement a rigorous, relevant, college preparatory curriculum that gives all students meaningful options for life. E.g., research on building the basic skills that form the foundation for productive lives, ways to challenge every student to achieve to his or her full potential, alignment of curriculum, instructional materials and approach, assessments, use of data, and professional development, and the roles of all stakeholders in student success.
- Data-Driven Decisions – Support decision-making with accurate information about how our students are performing and how the District as a whole is performing. E.g., evaluations of existing, high-priority DCPS programs, research on the design of strong data systems and the effective use of data on student performance to assess learning, design interventions, allocate resources, manage staff, and make decisions at the classroom, school, and district levels.
- Effective Central Office – Provide schools with the support they need to operate effectively. E.g., research on effective central office operations and budgeting in general and on food service provision in particular.
- Engaged Community – Partner with families and community members who demand better schools. E.g., research into parent, student, and community engagement, and ways that it can promote increasing student achievement and successful schools, as well as effective communication and partnership-building.

Appendix II: Factors Typically Considered in the Approval Process

- Appropriateness of the research topic for support in the public setting.
- DCPS' need for the data and/or findings likely to be produced.
- Technical soundness.
- Availability of research sites and subjects of the kinds requested.
- The kinds and number of data-gathering procedures or instruments to be used in the study.
- The kinds of background data on subjects requested and the kinds of information of a personal nature to be secured from the subjects themselves.
- The nature and amount of interruptions to the ongoing education program.
- Contributions of funds, equipment, training opportunities, and staff, to the participating schools and offices.
- The need for DCPS and the schools to safeguard the personal and legal rights of students, parents, and staff.

Appendix III: Template for Description of Proposed Compensation/Incentive Scheme for Participation in Research

“The NAME OF THE STUDY study, being conducted by NAME OF REQUESTER/ORGANIZATION is designed to DESCRIPTION. As a part of this study, NAME OF REQUESTER/ORGANIZATION is interested in DESCRIPTION OF DATA COLLECTION INCLUDING PARTICIPANTS. NAME OF REQUESTER/ORGANIZATION wants to provide financial incentives to schools and teachers in order to JUSTIFICATION. DESCRIPTION OF INCENTIVE SCHEME. NAME OF REQUESTER/ORGANIZATION believes that both the study and the proposed incentive component are in accordance with the mission of DCPS because REASON and are proper governmental functions because REASON.”

Appendix IV: Key Provisions from the DCPS Confidentiality Agreement

Researcher agrees to fulfill their responsibility on this project in accordance with the following guidelines:

1. To comply in all respects with the provisions outlined in (a) the DCPS Process and Requirements to Conduct Research or Obtain Confidential Data, and (b) the MOA between my organization and/or myself and DCPS.
2. To comply in all respects with applicable provisions of the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99).
3. To maintain, use, disclose, and share data received pursuant to the MOA in a manner authorized by FERPA and any applicable federal and District of Columbia law or regulation.
4. To use data shared under the MOA with DCPS for no purpose other than the research project described in the MOA, and as authorized under 34 CFR §§ 99.31(a)(6). Nothing in the MOA shall be construed to authorize me/my organization to have access to DCPS data beyond that included in the scope of the MOA. I/my organization further agree not to share Confidential Data received under the MOA with or permit access to such data by any individual or entity other than the Parties named in the MOA, for any purpose, except as permitted by the MOA and applicable law. I/my organization shall put procedures in place to safeguard the confidentiality and integrity of Confidential Data, to place limitations on its use and to maintain compliance with applicable privacy laws. I understand that the MOA does not convey me/my organization ownership of any Confidential Data.
5. To obtain all necessary approvals from authorized officials of my organization prior to beginning the Project. I will also obtain informed consent from Project participants as described in the DCPS Process and Requirements to Conduct Research or Obtain Confidential Data.
6. To require all employees, contractors, and agents of any kind working on the research project described in the MOA to comply with the MOA, the DCPS Process and Requirements to Conduct Research or Obtain Confidential Data, and all applicable provisions of FERPA and other laws with respect to the data and information shared under the MOA. I agree to require each employee, contractor, or agent with access to data to sign a security pledge and to provide such signed security pledges to DCPS.
7. To the extent DCPS has not provided student records with Personally Identifiable Information, I agree not to attempt to identify individuals, families, or households in such data except as required by the project described in the MOA. I shall not disclose data produced to me/my organization under the MOA in any manner that could identify any individual or school, except as authorized by FERPA, to any unauthorized person. I and persons participating in this project on behalf of the Parties named in the MOA shall neither disclose nor otherwise release data and reports relating to an individual or school, nor disclose information relating to a group or category of individuals without ensuring the confidentiality of individuals in that group. Publications and reports of these data and information related to them, including preliminary project descriptions and draft reports,

shall involve only aggregate data and no personally identifiable information or other information that could lead to the identification of any individual or school.

8. To not publish nor report on any DCPS data or information without first obtaining express written permission from DCPS.
9. To not provide any Confidential Data obtained under the MOA to any entity or person ineligible to receive Confidential Data or prohibited from receiving Confidential Data by virtue of a finding under 34 CFR § 99.31(a)(6)(iv), in any form, including electronically (including email) and hard copy.
10. To not share any Confidential Data obtained under the MOA via email with any entity or person including others participating in the project described in the MOA.
11. To notify DCPS immediately in the event of a breach of any measures to keep confidential the data received pursuant to my/my organization's MOA with DCPS. I will also make all reasonable efforts to cure any such breach and to prevent further breaches, and to inform DCPS of such efforts.
12. To return and/or destroy all Confidential Data as provided for in the MOA.

Appendix V: Information to be Included in Parent Consent Forms

- Title of the study and name, title and organization of the requester(s).
- Purpose(s) of data collection.
- Description of what participants will be asked to do.
- Amount of time required of participants.
- Notice that participants will be audio- or videotaped (if applicable) with an explanation of how the recordings will be used and what happens to the tapes after the research is completed.
- Description of confidential data the requester is requesting and how and when data will be destroyed. **There must be a separate yes/no check box referring to the release of student-level data.**
- Notice that all information will remain confidential.
- Notice that participation is entirely voluntary and participants may withdraw from the study at any time, without negative consequences.
- Notice of any reasonably foreseeable risks or benefits to the participant.
- A local or toll-free telephone number of requester(s).
- Space and lines for the student's name and parent/guardian signature. **There must be a check box for either consent or refusal to participate** and the parent signature must refer to "Yes, I agree to have my child participate" or "No, I do not give consent for my child to participate".
- If the consent form is longer than one page, a summary of what participants will be asked to do and/or the confidential data to be requested from DCPS must appear immediately above the parent's signature.
- In accordance with the Federal Protection of Pupil Rights Amendment (20 U.S.C. § 1232h; 34 CFR Part 98) requirement that parents/guardians have access to the materials that will be used in school with their children, consent forms must include the following text: "Parents please be aware that under the Protection of Pupil Rights Act. 20 U.S.C. Section 1232(c)(1)(A), you have the right to review a copy of the questions asked of or materials that will be used with your students. If you would like to do so, you should contact [INSERT APPROPRIATE CONTACT] at (XXX) XXX-XXXX to obtain a copy of the questions or materials."

Appendix VI: Information to be Included in Consent Forms for Adults Other Than Parents

- Title of the study and name, title and organization of the requester(s).
- Purpose(s) of data collection.
- Description of what participants will be asked to do.
- Amount of time required of participants.
- Notice that participants will be audio- or videotaped (if applicable) with an explanation of how the recordings will be used and what happens to the tapes after the research is completed.
- Description of confidential data the requester is requesting and how and when data will be destroyed. **There must be a separate yes/no check box referring to the release of individual-level data.**
- Notice that all information will remain confidential.
- Notice that participation is entirely voluntary and participants may withdraw from the study at any time, without negative consequences.
- Notice of any reasonably foreseeable risks or benefits to the participant.
- A local or toll-free telephone number of requester(s).
- Space and lines for the individual's name and signature. **There must be a check box for either consent or refusal to participate.**
- If the consent form is longer than one page, a summary of what participants will be asked to do and/or the confidential data to be requested from DCPS must appear immediately above the signature.